

HMK/jb GA7923

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LOUIS DREYFUS CORPORATION

Plaintiff,

07 Civ. 6622 (WHP)
ECF CASE

-against-

M/V CMA CGM CORTES, her engines,
boilers, tackle, etc., ALPHA SHIPMANAGEMENT
GMBH & CO., KG, ALPHA SHIP GMBH & CO
KG MS 'NEPTUN', COMPANIA SUD AMERICANA
DE VAPORES S.A. (C.S.A.V.)

DISCOVERY PLAN

Defendants.
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Pursuant to Federal Rule of Civil Procedure 26(f), counsel for plaintiff, Louis Dreyfus Corporation ("plaintiff"), and counsel for defendant, Compania Sud Americana de Vapores S.A. (CSAV), have discussed and agreed to the following discovery plan:

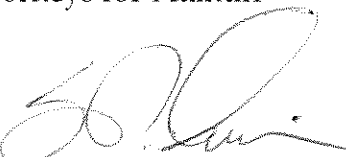
1. Initial disclosures required under the Federal Rule of Civil Procedure 26(a)(1) to be exchanged by November 21, 2007.
2. Both plaintiff and defendants shall serve requests for production of documents, pursuant to Federal Rule of Civil Procedure 34, no later than December 7, 2007.
3. Both plaintiff and defendants shall serve their notices of deposition, pursuant to Federal Rule of Civil Procedure 30, no later than December 7, 2007. Plaintiff anticipates deposing:

(a) Chief Mate or Captain; (b) defendants' surveyors and (c) supervisory shore personnel. (These witnesses are foreign based) Defendants anticipate deposing (a) Plaintiff's representative; and (b) plaintiff's surveyors.

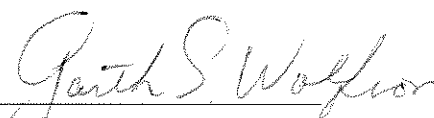
4. Plaintiff shall serve its expert's report upon defendants, pursuant to Federal Rule of Civil Procedure 26 (a)(2), no later than February 8, 2008. The reports shall set forth the facts on which the expert relies and the process of reasoning by which the expert's conclusions are reached.
5. Defendant shall serve its expert's rebuttal report upon plaintiff, pursuant to Federal Rule of Civil Procedure 26(a)(2), no later than February 29, 2008.
6. All discovery shall be complete by March 14, 2008.

Dated: New York, New York
November 7, 2007

KINGSLEY KINGSLEY & CALKINS
Attorneys for Plaintiff

By: 
STEVEN P. CALKINS
91 West Cherry Street
Hicksville, NY 11801
(516) 931-0064

MAHONEY & KEANE
Attorneys for Defendant CSAV

By: 
GARTH S. WOLFSON
111 Broadway
New York, NY 10006
(212) 385-1422